

REMARKS

The Office Action dated September 18, 2009, has been received and carefully reviewed. The preceding amendments and the following remarks form a full and complete response thereto. Support for the amendments to claim 1 may be found, inter alia, at page 9 and in FIGS. 1 and 2 of Applicants' specification. No new matter is added by this amendment. Reconsideration of the rejections, addressed in detail below, is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-9, 15, 17, 20-22, 24, 25, 28, 29-31 and 33-37 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,371,473 issued to Saltsov et al. ("Saltsov '473") in view of U.S. Patent No. 7,051,926 issued to Saltsov et al. ("Saltsov '926"). Applicants respectfully traverse this rejection and submit that these claims recite subject matter that is neither disclosed nor suggested by this combination of references.

Claim 1, upon which claims 2-9, 15, 17, 20-22, 24, 25, 28, 29-31 and 33-37 depend, defines an apparatus for processing bank notes. The apparatus includes a transport system having a plurality of transport paths for transporting bank notes. The transport system includes a diverter device with a bidirectionally drivable transport path linking two branchings of a transport path to permit bank notes in the transport path to be transported in two opposite directions. The diverter device includes at least four inputs/outputs and a diverter module with at least four inputs/outputs. The branchings

are disposed within the diverter module. The diverter module is a separate component arranged to be moved, as a whole, from a first position within the transport system to a second position at least partially away from the transport system. The bidirectionally drivable transport path is in fixed position relative to said diverter module.

Saltsov '473 and Saltsov '926 fail to disclose or suggest at least the feature of claim 1 regarding the recited branchings of the transport path and the diverter device that the branchings are disposed within the diverter module. The September 18, 2009 Office Action does not particularly identify any branchings in the cited references. Furthermore, even if the rotary switch member 500 of Saltsov '473 or the routing switch 130 of Saltsov '926 are considered as diverter modules, it is clear that there are no branchings disposed within these elements. As can be clearly seen in FIGS. 21-25 of Saltsov '473 and FIGS. 10-11 of Saltsov '926, both of these devices at best contain a plurality of non-branching paths. For example, as shown in FIG. 10 of neither of Saltsov '926, the routing switch 130 contains non-branching paths 185-189. See Saltsov '926 at col. 6, l. 64 through col. 7, l. 11.

Furthermore, neither Saltsov '473 nor Saltsov '926 disclose the feature of the transport path and the diverter module that the bidirectionally drivable transport path is in fixed position relative to said diverter module. As clearly disclosed by Saltsov '473, the rotary switch member 500 rotates relative to path 104. See Saltsov '473 at col. 8, ll. 32-60, and FIGS. 21-25. As clearly disclosed by Saltsov '926, the routing switch 130 rotates relative to path 17. See Saltsov '926 at col. 7, ll. 4-47.

Further, the combination of Saltsov '473 and Saltsov '926 fails to disclose, suggest, or make obvious an apparatus for processing bank notes wherein the branchings are disposed within a diverter module and wherein a bidirectionally drivable transport path is in fixed position relative to said diverter module.

Claims 2-9, 15, 17, 20-22, 24, 25, 28, 29-31 and 33-37 are dependent from claim 1 and incorporate all of the limitations recited therein and not disclosed by either Saltsov '473 and Saltsov '926. Therefore these claims are also patentable over this combination of references at least for the above reasons, in addition to the novel features that these claims recite individually. Accordingly, Applicants respectfully request that this rejection under 35 U.S.C. § 103(a) be withdrawn.

Claims 38 and 39 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,371,473 issued to Saltsov et al in view of U.S. Patent No. 7,051,926 issued to Saltsov et al. and further in view of U.S. Patent No. 5,996,888 issued to Gromatzky. Applicants respectfully traverse this rejection and submit that these claims recite features that are neither disclosed nor even suggested by this combination of references.

As discussed above, the combination of Saltsov '473 and Saltsov '926 fails to disclose or even suggest features related to the branchings being disposed within said diverter module or that the bidirectionally drivable transport path is in fixed position relative to said diverter module, as recited in claim 1. Claims 38 and 39 depend on claim 1 and incorporate all of the limitations recited therein and not disclosed or

suggested by either Saltsov '473 and Saltsov '926. Gromatzky fails to remedy this deficiency. Therefore claims 38 and 39 are patentable over this combination for at least this reason, in addition to the novel features that these claims recite individually. In view of the above, Applicants respectfully request that this rejection under 35 U.S.C. § 103(a) be withdrawn.

Claims 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saltsov '473 in view of Saltsov '926 and further in view of U.S. Patent No. 6,241,069 issued to Mennie et al. Applicants respectfully traverse this rejection and submit that these claims recite features that are neither disclosed nor even suggested by this combination of references.

As discussed above, the combination of Saltsov '473 and Saltsov '926 fails to disclose or even suggest features related to the branchings being disposed within said diverter module or that the bidirectionally drivable transport path is in fixed position relative to said diverter module, as recited in claim 1. Claims 18 and 19 depend on claim 1 and incorporate all of the limitations recited therein and not disclosed or suggested by either Saltsov '473 and Saltsov '926. Mennie fails to remedy this deficiency. Therefore claims 18 and 19 are patentable over this combination for at least this reason, in addition to the novel features that these claims recite individually. In view of the above, Applicants respectfully request that this rejection under 35 U.S.C. § 103(a) be withdrawn.

Claim 23 was rejected under 35 U.S.C. §103(a) as being unpatentable over Saltsov '473 in view of Saltsov '926 and further in view of U.S. Patent No. 6,540,136 issued to Ross. Applicants respectfully traverse this rejection and submit that claim 23 recite features that are neither disclosed nor even suggested by this combination of references.

As discussed above, the combination of Saltsov '473 and Saltsov '926 fails to disclose or even suggest features related to the branchings being disposed within said diverter module or that the bidirectionally drivable transport path is in fixed position relative to said diverter module, as recited in claim 1. Claim 23 depends on claim 1 and incorporates all of the limitations recited therein and not disclosed or suggested by either Saltsov '473 and Saltsov '926. Gromatzky fails to remedy this deficiency. Therefore claim 23 is patentable over this combination for at least this reason, in addition to the novel features that claim 23 recites individually. In view of the above, Applicants respectfully request that this rejection under 35 U.S.C. § 103(a) be withdrawn.

In view of the above, all objections and rejections have been sufficiently addressed. The Applicants submit that the application is now in condition for allowance and request that claims 1-2, 4-11 and 18-35 be allowed and this application passed to issue.

In the event that this paper is not timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account No. 02-2135.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

Respectfully submitted,

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